

# Sills Cummis & Gross

A Professional Corporation

The Legal Center  
One Riverfront Plaza  
Newark, New Jersey 07102  
Tel: (973) 643-7000  
Fax (973) 643-6500

Jeffrey J. Greenbaum  
Member  
Admitted In NJ, NY  
Direct Dial: 973-643-5430  
Email:  
jgreenbaum@sillscummis.com

101 Park Avenue  
28<sup>th</sup> Floor  
New York, NY 10178  
Tel: (212) 643-7000  
Fax: (212) 643-6500

November 7, 2023

**By ECF**

The Honorable Cathy L. Waldor, U.S.M.J.  
United States District Court, District of New Jersey  
50 Walnut Street  
Newark, NJ 07101

**Re: *Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC***  
**Civil Action No. 22-2632 (ES-CLW)**

Dear Judge Waldor:

Together with Patterson Belknap Webb & Tyler LLP, we represent Plaintiff Johnson & Johnson Health Care Systems Inc. ("JJHCS") in the above-referenced action. We write jointly with counsel for Defendant Save On SP, LLC to request a single consolidated deadline of November 21, 2023, for the parties to file any outstanding motions to seal, including any motions related to: (i) the letter from Jeffrey Greenbaum, dated October 24, 2023 (ECF No. 163), (ii) the joint letter regarding JJHCS custodians, dated October 25, 2023 (ECF No. 165), (iii) the joint letter regarding CAP search terms, dated October 25, 2023 (ECF No. 166), (iv) the letter from Evans Wohlforth, dated October 26, 2023 (ECF No. 169), and (v) the transcript of the October 30, 2023 status conference (ECF No. 171). In light of the number of potential motions, the parties seek the additional time to meet and confer regarding the proposed redactions and to prepare the appropriate requests. This is the parties' first request for an extension of time to file any of these motions.

We respectfully request that Your Honor "so order" this letter to indicate the Court's consent to the above proposal. We appreciate the Court's attention to this matter.

Respectfully yours,

/s/ Jeffrey J. Greenbaum

JEFFREY J. GREENBAUM

cc: All counsel of record (by ECF)